UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN

SHANNON LEWANDOWSKI,

Plaintiff,

v.

Case No. 16C1089

CITY OF MILWAUKEE,

Defendant.

DEFENDANT'S RESPONSE TO PLAINTIFF'S EXPEDITED MOTION TO EXTEND DISCOVERY AND DISPOSITIVE MOTION DEADLINES

This is Defendant City of Milwaukee's response to Plaintiff Lewandowski's motion to extend the scheduling order (ECF No. 59), specifically the due dates of close of discovery and dispositive motions. Defendant is not opposed to the motion itself, but does dispute and object to the dates as indicated in the motion as set forth below.

Plaintiff correctly lists the end of discovery as October 31, 2018, and requests a reset date of December 14, 2018 (44 days), but incorrectly lists the current due date of dispositive motions as November 23, 2018, and then proposes a reset date of January 31, 2019 (69 days). The actual currently scheduled due date for dispositive motions is January 4, 2019, as set by text order of the Court on September 12, 2018 (granting stipulated motion ECF No. 56).

Defendant does not oppose Plaintiff's motion to extend the close of discovery by approximately 45 days to December 14, 2018; however, Defendant's counsel is currently

scheduled as unavailable due to vacation the work week of December 3-7, and thus proposes a one week extension on the Plaintiff's proposed reset date to December 21, 2018.

Defendant does not oppose an extension on the due date of dispositive motions, but opposes the date proposed in the motion and instead submits February 18, 2019, 45 days after the current date, as the reset date.

Dated and signed at Milwaukee, Wisconsin 1 day of November, 2018.

GRANT F. LANGLEY City Attorney

<u>s/ ROBIN A. PEDE</u>RSON

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1032-2016-1768